

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

Furnish this exhibit for EACH foreign principal listed in an initial statement  
and for EACH additional foreign principal acquired subsequently.

1. Name and address of registrant Patton, Boggs & Blow 1200 17th Street, N.W. Washington, D.C.		2. Registration No. 2165
3. Name of foreign principal The Metal Market and Exchange Co. Ltd.	4. Principal address of foreign principal 1 Metal Exchange Buildings Whittington Avenue London, England EC3V1LB	

5. Indicate whether your foreign principal is one of the following type:

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee
<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input type="checkbox"/> Other (specify) _____

☐ Individual - State his nationality \_\_\_\_\_

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant. N.A.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address N.A.

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The Metal Market and Exchange Co Ltd. (The London Metal Exchange) provides suitable facilities in London, England for the purpose of carrying on an orderly trade in designated metals which currently are tin, copper, lead, zinc and silver. The company also governs the conduct of the subscribers of the Exchange in the trading of such metals.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal . . . . Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal . . . . Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal . . . . Yes ☐ No ☒

Financed by a foreign government, foreign political party, or other foreign principal . . . . Yes ☐ No ☒

Subsidized in whole by a foreign government, foreign political party, or other foreign principal . . . . . Yes ☐ No ☒


Subsidized in part by a foreign government, foreign political party, or other foreign principal . . . . . Yes ☐ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

N.A.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

The Metal Market and Exchange Co. Ltd. is owned by its subscribers and controlled by a board of not more than nine directors all of whom must be subscribers and one-third of whom are replaced each year.

Date of Exhibit A March 22, 1977	Name and Title James R. Patton, Jr. Managing Partner	Signature 
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UNITED STATES DEPARTMENT OF JUSTICE  
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT  
Under the Foreign Agents Registration Act  
of 1938, as amended

RECEIVED JUSTICE  
DEPARTMENT OF JUSTICE  
APR 25 2 33 PM '77  
REGISTRATION UNIT  
CRIMINAL DIVISION

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Patton, Boggs & Blow	The Metal Market and Exchange Co. Ltd.

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
  - ☒ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
  - ☐ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.
4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Representation of The Metal Market and Exchange Co. Ltd.  
before the Commodity Futures Trading Commission which will  
involve legal analysis and review of proposed and existing  
regulations of the Commission and, inter alia, the pre-  
paration and submission of comments thereon.

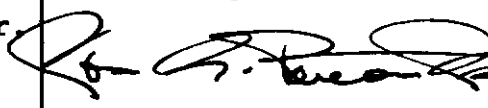
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

See No. 4.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?<sup>1/</sup> Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The representation may involve communications on behalf of the foreign principal with agencies of the U.S. Government including the Commodity Futures Trading Commission and the U.S. Department of State with a view toward changing or influencing the domestic or foreign policies of the U.S. with respect to the regulation of various aspects of trading in commodities.

Date of Exhibit B	Name and Title	Signature
March 22, 1977	James R. Patton, Jr. Managing Partner	

<sup>1/</sup> Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

# *The Metal Market & Exchange Co. Ltd*

*(The London Metal Exchange)*

*Registered Office: 1. Metal Exchange Buildings,  
Whittington Avenue,  
London, EC3V 1LB*

Secretary  
R. K. MILLETT

PGS/DW.

11th March, 1977.

Patton, Boggs & Blow,  
1200 Seventeenth Street, N.W.  
Washington, D.C. 20036,  
U.S.A.

RECEIVED  
DEPARTMENT OF JUSTICE  
MAR 25 2 33 PM '77  
REGISTRATION UNIT  
CRIMINAL DIVISION

Dear Sirs,

This is to confirm the retention of your firm by the Metal Market & Exchange Co. Ltd. for the purpose of representing our interests before the U.S. Commodity Futures Trading Commission. We understand that we will be billed for services performed at your regular hourly rates, plus expenses.

Yours truly,  
for and on behalf of The Metal Exchange Co. Ltd.

  
F. G. Smith.  
Chairman.